



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
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Seattle, WA 98101-3140

OFFICE OF  
ENVIRONMENTAL CLEANUP

September 9, 2013

Mr. Bob Wyatt  
NW Natural  
220 NW 2nd Avenue  
Portland OR 97209

*sent via email only*

Mr. Myron Burr  
Siltronic Corporation  
7200 NW Front Avenue, M/S 20  
Portland, Oregon 97210-3676

RE: EPA's Response to NW Natural's Response to EPA's Review of *Study Design for Sediment Characterization Adjacent to U.S. Moorings Site Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan*, Gasco Sediments Site

Dear Sirs:

This letter responds to NW Natural's September 5, 2013 response to EPA's August 15, 2013 review comments on the *Study Design for Sediment Characterization Adjacent to U.S. Moorings Site, Addendum 1 to the Project Area Identification Report Quality Assurance Project Plan* (Study Design), dated July 18, 2013, and prepared by Anchor QEA. Following are EPA's responses to NW Natural's responses to the six comments originally submitted by EPA to NW Natural and Siltronic Corporation.

**Comment #1**

NW Natural's response is acceptable. NW Natural can use 14-foot core tubes for sampling. However, if adequate recovery is not achieved to attain the depth needed to verify substantial product at a particular core location then NW Natural agrees to re-advance the core using a 20-foot core tube at that location. Cores of particular concern include 50-BG (substantial product identified at a maximum depth of 11.5 feet below mudline), 20-BF (substantial product identified at a maximum depth of 9.7 feet below mudline), and C528 (substantial product potentially identified within 5 feet of the proposed new dredge surface in a range encompassing 5.1 to 14.5 feet below mudline as the log does not specify the exact location).

**Comment #2**

NW Natural's response is acceptable. NW Natural agrees to note on the core log whether core recovery included the upper 5 feet of the sediment column.

**Comment #3**

EPA agrees with NW Natural that the Gasco Sediments Site Statement of Work (SOW) defines substantial product and that "visual observations in sediment cores shall be the primary parameter used for this line of evidence." EPA suggested chemical analysis in those cases where "stained" sediment bands greater than 2-inches thick are observed within 5 feet of the current or future dredge surface as another line of evidence to help determine if the "staining" is truly

product or is the result of discoloration unrelated to manufactured gas plant hydrocarbon waste. EPA agrees that chemical analysis is not a requirement for defining substantial product. Other lines of evidence including hydrocarbon odors, sheen, elevated organic vapor meter (OVM) readings, blebs, and other field indicators may be used beyond visual observance of staining to determine if the “stained” band constitutes substantial product. EPA is not requiring chemical analysis as a condition of identifying substantial product, but EPA notes that NW Natural has already agreed to archive samples from substantial product intervals in the Study Design. This suggestion also relates to evaluation of other lines of evidence in the EE/CA, e.g. evaluation of non substantial product areas for capping vs. dredging.

#### **Comment #4**

NW Natural’s response is acceptable. NW Natural agrees to document the approximate volume of visually non-impacted sediment that may be included with a thin seam of visually impacted sediments on the sampling logs.

#### **Comment #5**

NW Natural agrees to collect samples and archive them from the following intervals: 0 to 1-foot, 1 to 4-foot, 4 to 8-foot, 8 to 12-foot assuming that a 14-foot core tube will be used for sampling. EPA discussed the contingency if a 20-foot core tube is utilized to attain required depths (see Comment #1) with Mr. Bob Wyatt, NW Natural, on September 6, 2013. Mr. Wyatt agreed that samples would be collected and archived from the following intervals if a 20-foot core tube is used for sampling: 0 to 1-foot, 1 to 4-foot, 4 to 8-foot, 8 to 12-foot, 12 to 16-foot, and greater than 16-foot depth intervals.

#### **Comment #6**

NW Natural’s response is acceptable. NW Natural agrees to slightly revise the station nomenclature to differentiate this sampling event from previous events.

EPA discussed the issue of providing the U.S. Army Corps of Engineers (USACE) access to observe cores collected by NW Natural with Mr. Bob Wyatt on September 6, 2013. EPA clarified that USACE’s access to observe the cores during NW Natural’s sampling event would be reciprocated when USACE conducts their own investigation scheduled for the 2013 field season. EPA will facilitate obtaining access for NW Natural representatives to observe cores collected by USACE during their investigation. EPA recognizes the health and safety concerns and liability issues that may be caused by providing USACE representatives access to observe the cores, but EPA believes the benefits of having both involved parties present to observe and concur with the potential substantial product designations outweighs these concerns. Mr. Wyatt concurred with providing USACE access to the cores to be obtained from this sampling event so that NW Natural could access the cores to be collected through USACE’s investigation. EPA understands core access to, at a minimum, consist of staff observation at the core processing area.

EPA would like to resolve any remaining issues in an expedited manner so that the investigation can be completed prior to October 31, 2013. EPA is aware that NW Natural would like to schedule an in-person workshop with EPA and our oversight consultant to discuss and review representative examples of substantial product cores. EPA agrees to participate in the workshop

but it should be noted that any issues or disagreements that arise regarding visual indicators of substantial product should not delay the investigation schedule. Please submit a detailed schedule to EPA as soon as possible that accomplishes the October 31 completion.

The Study Design is conditionally approved with the revisions noted above with a field completion deadline of October 31, 2013 noted in our August 15 letter. Please let me know if you have any questions or concerns at (206) 553-1220 or via email at sheldrake.sean@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to be 'SS', with a long horizontal line extending to the right.

Sean Sheldrake, RPM

Cc:

Kristine Koch, EPA  
Chip Humphrey, EPA  
Mark Ader, EPA  
Dana Bayuk, ODEQ

*via email only*